

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE Western DISTRICT OF Wisconsin

FILED/RECD

2024 MAY 30 PM 2:11

CLERK OF COURT

U.S. DISTRICT COURT

(Full name of plaintiff(s))

Hussein Khalaf

vs

Case Number:

24 CV 359 JDP

(Full name of defendant(s))

Immigration and Customs Enforcement

(ICE) and their Contractors [Chase

County, KS] [Kay County, OK] [Dodge County, WI]

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Iraq, and is located at
(State)

216 W. Center St, Juneau, WI 53039 (Dodge County Jail)

(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Immigration and Customs Enforcement (ICE).
(Name)

is (if a person or private corporation) a citizen of _____
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for DHS
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

The plaintiff Hussein Khalaf is detained at Dodge County Jail in Juneau, Wisconsin. During my detention by ICE since 5/1/2023, I have faced discrimination, racism, physical threats, abuse, death threats. I will list the major events as follows:

1. Chase County Jail, KS (5/1/2023 - 10/10/2023): On 6/14/2023, a Co named 'Neil' and while handling me my legal mail, told me "Open it maybe there is a BOMB in it" and started laughing. I filed a grievance regarding that, but ICE said "It is joke"! instead this grievance opened the gates of hell of retaliation against me from Chase and ICE. I had physical threats from Co 'Benny' in June, 2023 also messing up my food (giving me meat many times when I am Vegetarian).

humiliation from Cos and ICE, for example ICE officer "Jerry Gariety" on 9/15/2023 told me while Yelling at me "You are a non citizen in a removal proceedings, and you should be grateful we give you food"! This retaliation was topped by exposing my Asylum Case from Chase County manager "Larry Sigler".

2- Kay County, OK (10/10/23- 2/2/2024): In January, 2024, me and all inmates refused the facial recognition system to get our food. I continued refusing because it is a violation to my privacy, Kay County took my food away and starved me for 3 days, then moved me back to Chase as a retaliation. (for one week)

3- Dodge County, WI (2/2/24-present): My problems continued with retaliation, giving me meat many times, and when I filed a grievance they retaliated more, cut my food to half, gave me cheese (even though I told the nurse I am allergic to it).

Discrimination here was very clear, when I applied to a job here (since 2/12/24) and noticed that every single One who came after me worked (some of them worked after 2 days of being here). When I mentioned that to OIDD (DHS), I was faced with death threats from two inmate workers (Americans), I reported that and no one cared! the retaliation continued to even denying to make copies for me for anything (Thats why now I dont have any 2nd copy of this) when they make copies to everyone else.

(Please read my original letter for more details). Also here I was denied to see a doctor for the injury in my back during transfer.

C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I am humbly asking to hold ICE and their Contractors responsible for the abuse, threats, mental health damage that happened to me and many ICE detainees. Also, to stop retaliation against people who ask for their basic rights. I want immigration detainees to have equal rights (drinking water, microwave, freedom of speech). I want ICE and everyone to take death threats against me seriously and move me from this jail.
Ultimatley, I want to be released or let me buy my ticket and leave (because I have a Voluntary Departure Order since 5/7/24) but ICE keep detaining me illegally, and that is another type of retaliation. Also, I want proper treatment to my back injury.
God Bless.

E. JURY DEMAND

Jury Demand - I want a jury to hear my case
OR
 Court Trial – I want a judge to hear my case

Dated this 23 day of May 2024.

Respectfully Submitted,

Hussein
Signature of Plaintiff

220 869 585
Plaintiff's Prisoner ID Number

Dodge County Jail, 216 W. Center St.
Juneau, WI 53039
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE
FILING FEE**

I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.